

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**
Richmond Division

| | | |
|--------------------------|---|-----------------------|
| IN RE: |) | |
| |) | |
| DOMINIQUE MONTRALL SLOAN |) | Case No. 19-35678-KRH |
| AMY CLARICE SLOAN |) | Chapter 13 |
| |) | |
| Debtors |) | |

MOTION TO INCUR DEBT

COMES NOW, the Debtors, by counsel, and as and for their Motion to Incur Debt, state as follows:

1. The Debtors filed this case under Chapter 13 of the U.S. Bankruptcy Code on October 28, 2019.
2. The Debtors have applied for and Dallas Lease Returns has approved a loan to the Debtors in the amount of \$23,936.13 plus interest at 18.45% per annum to be repaid with 72 equal monthly payments of \$498.18 for the purchase of a 2017 Toyota RAV4 or similar vehicle.
3. The Debtors need to purchase the referenced vehicle because Ms. Sloan currently does not own a vehicle to commute to and from work.
4. The purchase of the vehicle is in the best interest of the Debtors and will facilitate their ability to perform under their Chapter 13 Plan filed herein.
5. The Debtors' Chapter 13 Plan has been confirmed.

WHEREFORE, the Debtors request that the Court enter an Order approving the aforesaid loan on the terms stated herein and for such other relief as the Court may deem appropriate.

James E. Kane (VSB #30081)
KANE & PAPA, P.C.
1313 East Cary Street
Richmond, VA 23219
(804) 225-9500 (phone)
(804) 225-9598 (fax)
Counsel for Debtors

DOMINIQUE MONTRALL SLOAN
AMY CLARICE SLOAN

By: /s/ James E. Kane
Counsel

James E. Kane (VSB #30081)
KANE & PAPA, P.C.
1313 East Cary Street
Richmond, VA 23219
(804) 225-9500 (phone)
(804) 225-9598 (fax)
Counsel for Debtors

CERTIFICATE OF SERVICE

I hereby certify that on December 10, 2020, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all counsel of record who have signed up to receive such notification and by first class mail to the parties on the attached list.

/s/ James E. Kane
James E. Kane

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**
Richmond Division

| | | |
|--------------------------|---|-----------------------|
| IN RE: |) | |
| |) | |
| DOMINIQUE MONTRALL SLOAN |) | |
| AMY CLARICE SLOAN |) | Case No. 19-35678-KRH |
| |) | Chapter 13 |
| Debtors |) | |

NOTICE OF MOTION

The above Debtors have filed Motion to Incur Debt in the above matter.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the relief sought in the motion, or if you want the court to consider your views on the motion, then, within twenty-one (21) days from the date of this Notice you or your attorney must:

- File with the court, at the address shown below, a written request for a hearing [or written response pursuant to Local Bankruptcy Rule 9013-1(H)]. If you mail your request for a hearing (or response) to the court for filing, you must mail it early enough so the court will receive it on or before the date stated above, to:

Clerk of Court
United States Bankruptcy Court
701 East Broad Street
Richmond, VA 23219

You must also mail a copy to:

James E. Kane, Esquire
Kane & Papa, P.C.
1313 East Cary Street
Richmond, Virginia 23219

- Attend a hearing to be scheduled at a later date. You will receive a separate notice of hearing. If no timely response has been filed opposing the relief requested, the court may grant the relief without holding a hearing.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

Dated: December 10, 2020

DOMINIQUE MONTRALL SLOAN
AMY CLARICE SLOAN

By: /s/ James E. Kane
Counsel

James E. Kane (VSB #30081)
KANE & PAPA, P.C.
1313 East Cary Street
Richmond, VA 23219
(804) 225-9500 (phone)
(804) 225-9598 (fax)
Counsel for Debtors

CERTIFICATE OF SERVICE

I hereby certify that on December 10, 2020, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all counsel of record who have signed up to receive such notification and by first class mail to the parties on the attached list.

/s/ James E. Kane
James E. Kane

Label Matrix for local noticing

0422-3

Case 19-35678-KRH

Eastern District of Virginia

Richmond

Wed Dec 9 13:25:02 EST 2020

United States Bankruptcy Court

701 East Broad Street

Richmond, VA 23219-1888

Exeter Finance LLC, c/o AIS Portfolio Service

4515 N Santa Fe Ave. Dept. APS

Oklahoma City, OK 73118-7901

LVNV Funding LLC

PO Box 10587

Greenville, SC 29603-0587

Aaron Sales and Lease

1015 Cobb Place Blvd NW

Kennesaw, GA 30144-3672

Aaron's, Inc.

PO Box 100039

Kennesaw, GA 30156-9239

Account Resolution Ass

9301 Corbin Ave Ste 1600

Northridge, CA 91324-2515

Bridgecrest Credit

7300 E Hampton Ave

Suite 101

Mesa, AZ 85209-3324

Carrington Mortgage Services

P.O. Box 3489

Anaheim, CA 92803-3489

Comenity Bank

PO Box 182789

Columbus, OH 43218-2789

Credit Control Corporation

Attn: Bankruptcy

Po Box 120568

Newport News, VA 23612-0568

Emporia Hospital Corporation

727 N Main Street

Emporia, VA 23847-1274

Exeter Finance Corp

Po Box 166008

Irving, TX 75016-6008

Exeter Finance LLC

AIS Portfolio Services, LP

4515 N Santa Fe Ave. Dept. APS

Oklahoma City, OK 73118-7901

Exeter Finance LLC c/o AIS Portfolio Service

4515 N Santa Fe Ave. Dept. APS

Oklahoma City, OK 73118-7901

I.c. System, Inc

Attn: Bankruptcy

Po Box 64378

St. Paul, MN 55164-0378

Jack Randall

28319 Southampton Pkwy

Courtland, VA 23837-2193

Jefferson Capital Systems, LLC

Po Box 1999

Saint Cloud, MN 56302-0000

Kool Smiles

4722 N. Southside Plaza St

Richmond, VA 23224-1742

Medical Data Systems Inc

Attn: Bankruptcy Dept

2001 9th Ave Ste 312

Vero Beach, FL 32960-6413

Memorial Med Center

Attn #18117J

PO Box 1400

Belfast, ME 04915-0000

Midland Funding

2365 Northside Dr Ste 300

San Diego, CA 92108-2709

Midland Funding LLC

PO Box 2011

Warren, MI 48090-2011

Miramed Revenue Group

Attn: Bankruptcy

360 East 22nd Street

Lombard, IL 60148-4924

Southern Cars Inc

709 North Main

Emporia, VA 23847-1274

Southern Virginia Regional Med

P O Box 1022

Wixom, MI 48393-1022

Verizon Wireless

P.O. Box 25505

Lehigh Valley, PA 18002-5505

WILMINGTON SAVINGS FUND SOCIETY, FSB,

Carrington Mortgage Services, LLC

1600 South Douglass Road

Anaheim, CA 92806

(92806-5951

Amy Clarice Sloan

4317 Presto Circle

Grand Prairie, TX 75052-4339

Dominique Montrall Sloan

4317 Presto Circle

Grand Prairie, TX 75052-4339

James E. Kane
Kane & Papa, PC
1313 East Cary Street
P.O. Box 508
Richmond, VA 23218-0508

John P. Fitzgerald, III
Office of the US Trustee - Region 4 -R
701 E. Broad Street, Ste. 4304
Richmond, VA 23219-1849

Suzanne E. Wade
341 Dial 877-996-8484 Code 2385911
7202 Glen Forest Drive, Ste. 202
Richmond, VA 23226-3770

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)Wilmington Savings Fund Society, FSB, As T

(d)LVNV Funding LLC
PO Box 10587
Greenville, SC 29603-0587

(du)WILMINGTON SAVINGS FUND SOCIETY, FSB, AS

End of Label Matrix
Mailable recipients 32
Bypassed recipients 3
Total 35